

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

**Morton International, Inc.  
1102 Leiter Drive  
Warsaw, Indiana 46580**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F085-12589-00085	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 26, 2001  Expiration Date: November 26, 2006

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a powder coating manufacturing facility.

Authorized individual:	Keith Ort
Source Address:	1102 Leiter Drive, Warsaw, Indiana 46580
Mailing Address:	1102 Leiter Drive, Warsaw, Indiana 46580
SIC Code:	2851
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) air classifying mill, identified as ACM-1, installed in 1978 and modified in 1999, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-1.
- (b) One (1) air classifying mill, identified as ACM-2, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-2.
- (c) One (1) air classifying mill, identified as ACM-3, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-3.
- (d) One (1) air classifying mill, identified as ACM-4, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-4.
- (e) One (1) air classifying mill, identified as ACM-5, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-5.
- (f) One (1) air classifying mill, identified as ACM-6, installed in 1978 and modified in 1997, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr,

equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-6.

- (g) One (1) air classifying mill, identified as ACM-7, installed in 1993, with a maximum capacity of 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-7.
- (h) One (1) air classifying mill, identified as ACM-8, installed in 1993, with a maximum capacity of 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-8.
- (i) Multiple dust collection points in the Weigh-up and Blending Area, identified as weigh-up area dust collection system, installed in 1994, with a maximum throughput of 6,040 lb/hr, including the pneumatic empty bag collection and compactor system and exhausting to stacks WU-1 and WU-2.
- (j) Multiple dust collection points in the Extrusion area, identified as extrusion area dust collection system with a maximum throughput of 6,040 lb/hr and exhausting to stack EX.
- (k) One (1) quality control and sample testing area, identified as QC dust collection with a maximum capacity of 4.2 lb/hr and exhausting to stacks QCN and QCS.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Space heaters;
  - (2) Water heaters and;
  - (3) 300,000 Btu/hr extruder blade burn off incinerator.
- (b) Cleaners and solvents having a vapor pressure less than 15 mm Hg, or having a vapor pressure less than 5 mm Hg, the use of which does not exceed 145 gallons per year.
- (c) Closed loop cooling systems.
- (d) Operations using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) On-site fire and emergency response training approved by the department.
- (g) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate less than or equal to 4000 acfm, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (h) Other categories with emissions below insignificant thresholds:

- (1) Hoffman Dust Collection System - East;
- (2) Hoffman Dust Collection System - West; and
- (3) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.

A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

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- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## **SECTION B                      GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not effect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall also provide additional information as requested by IDEM, OAQ, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(2).

(c) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for

modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

- (d) Upon written request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA and IDEM, OAQ, along with a claim of confidentiality.
- (e) Such confidentiality claims shall meet the requirements of 40 CFR part 2, Subpart B (when submitting to the U.S. EPA) and 326 IAC (when submitting to IDEM, OAQ).

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period



from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
1-800-753-5519 or 219-245-4870 (ask for Northern Regional Office)  
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ, and Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent either by mail or facsimile, to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit;
  - (2) An emergency as defined in 326 IAC 2-7-1(12);
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation; or
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failures exceed 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16** Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and

reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, any records that must be kept under the conditions of this permit;
- (c) Inspect, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e) and (f), and 326 IAC 1-7-5 (d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]  
[326 IAC 2-8-5(1)]

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
  - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
  - (1) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) Records of Preventive Maintenance may be used to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation on emissions or potential to emit, or a deviation as defined in B.15(b). The records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to Take Response Steps, of this permit, and whether a deviation from a permit condition was reported.

**C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken, must be reported. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report(s) do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) air classifying mill, identified as ACM-1, installed in 1978 and modified in 1999, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-1.
- (b) One (1) air classifying mill, identified as ACM-2, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-2.
- (c) One (1) air classifying mill, identified as ACM-3, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-3.
- (d) One (1) air classifying mill, identified as ACM-4, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-4.
- (e) One (1) air classifying mill, identified as ACM-5, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-5.
- (f) One (1) air classifying mill, identified as ACM-6, installed in 1978 and modified in 1997, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-6.
- (g) One (1) air classifying mill, identified as ACM-7, installed in 1993, with a maximum capacity of 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-7.
- (h) One (1) air classifying mill, identified as ACM-8, installed in 1993, with a maximum capacity of 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-8.
- (i) Multiple dust collection points in the Weigh-up and Blending Area, identified as weigh-up area dust collection system, installed in 1994, with a maximum throughput of 6,040 lb/hr, including the pneumatic empty bag collection and compactor system and exhausting to stacks WU-1 and WU-2.
- (j) Multiple dust collection points in the Extrusion area, identified as extrusion area dust collection system with a maximum throughput of 6,040 lb/hr and exhausting to stack EX.
- (k) One (1) quality control and sample testing area, identified as QC dust collection with a maximum capacity of 4.2 lb/hr and exhausting to stacks QCN and QCS.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-8-4(1)]

### D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each source was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
 P = process weight rate in tons per hour

The following table lists each source and its allowable PM emission rate:

Unit	Process Weight Rate (ton/yr)	PM Emission (lb/hr)
ACM-1	1.25	4.76
ACM-2	1.25	4.76
ACM -3	1.25	4.76
ACM-4	1.25	4.76
ACM-5	1.25	4.76
ACM-6	1.25	4.76
ACM-7	1.25	4.76
ACM-8	1.25	4.76
Weigh-up area dust collection	3.02	8.6
Extrusion area dust collection	3.02	8.6
QC area dust collection	0.0021	0.66

### D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The source will limit PM emissions to less than 100 tons per year which will render 326 IAC 2-2 (PSD Rules) not applicable. The source will be in compliance with the limitation by controlling PM emissions with the product collection cyclones and the dust collectors, in series. The PM emissions will be limited as follows:

Emission Unit	Allowable PM Emissions (tons/year)
ACM-1	1.64
ACM-2	1.64
ACM-3	1.64
ACM-4	1.64
ACM-5	1.64
ACM-6	1.64
ACM-7	1.64
ACM-8	1.64
Weigh-up dust collection	0.34

Emission Unit	Allowable PM Emissions (tons/year)
Extrusion area dust collection	0.21
QC area dust collection	0.09

#### D.1.3 FESOP PM10 Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), the source will limit PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit program) not applicable. The source will be in compliance with the limitation by controlling PM10 emissions with the product collection cyclones and the dust collectors, in series. The PM10 emissions will be limited as follows:

Emission Unit	Allowable PM10 Emissions (lbs/hour)
ACM-1	0.38
ACM-2	0.38
ACM-3	0.38
ACM-4	0.38
ACM-5	0.38
ACM-6	0.38
ACM-7	0.38
ACM-8	0.38
Weigh-up dust collection	0.078
Extrusion area dust collection	0.048
QC area dust collection	0.020

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.1.5 Particulate Matter (PM)

- (a) In order to comply with conditions D.1.1, D.1.2, and D.1.3, the dust collectors for PM control shall be in operation and control emissions at all times that the listed units are in operation.
- (b) In order to comply with conditions D.1.1, D.1.2, and D.1.3, the cyclones used for product collection shall be in operation and control PM emissions at all times that the air classifying mills are in operation.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across each dust collector used in conjunction with ACM-1 through ACM-8, the weigh-up dust collection, extrusion area dust collection, and the QC dust collection, at least once per shift when the processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each dust collector shall be maintained within the range of 2.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.1.8 Dust Collector Inspections

An inspection shall be performed each calendar quarter of all cartridge filters used in the dust collectors controlling the processes when venting to the atmosphere. A cartridge filter inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective filters shall be replaced.

#### D.1.9 Broken or Failed Filter Detection

In the event that filter failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the

requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of stack exhaust once per shift.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain the following:
  - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with D.1.8 and D.1.9, the Permittee shall maintain records of the results of the inspection required under D.1.8 and D.1.9 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (1) Space heaters.
  - (2) Water heaters, and;
  - (3) 300,000 Btu/hr extruder blade burn-off incinerator.
- (b) Cleaners and solvents having a vapor pressure less than 15 mm Hg, or having a vapor pressure less than 5 mm Hg, the use of which does not exceed 145 gallons per year.
- (c) Closed loop cooling systems.
- (d) Operations using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) On-site fire and emergency response training approved by the department.
- (g) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate less than or equal to 4000 acfm, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (h) Other categories with emissions below insignificant thresholds:
  - (1) Hoffman Dust Collection System - East;
  - (2) Hoffman Dust Collection System - West; and
  - (3) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Burning Regulations [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the 300,000 Btu/hr burn-off incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.

- (d) Be maintained properly as specified by the manufacturer's recommendations and only burn waste approved by the commissioner.
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.
- (h) Allow only particulate matter emissions less than:
  - (1) Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three tenths (0.3) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or
  - (2) All other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1,000) of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.
- (i) Not create a nuisance or a fire hazard.

If any of the above, conditions are not met, the burning shall be terminated immediately.

#### D.2.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the grinding and machinery operations and Hoffman Dust Collection Systems shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Morton Powder Coatings  
Source Address: 1102 Leiter Drive, Warsaw, Indiana 46580  
Mailing Address: 1102 Leiter Drive, Warsaw, Indiana 46580  
FESOP No.: F085-12589-00085

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY/OCCURRENCE REPORT**

Source Name: Morton Powder Coatings  
Source Address: 1102 Leiter Drive, Warsaw, Indiana 46580  
Mailing Address: 1102 Leiter Drive, Warsaw, Indiana 46580  
FESOP No.: F085-12589-00085

**This form consists of 2 pages**

**Page 1 of 2**

- |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li><input type="checkbox"/> The Permittee must submit notice by mail or facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:	
Date/Time Emergency was corrected:	
Was the facility being properly operated at the time of the emergency?	Y    N
Describe:	
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:	
Estimated amount of pollutant(s) emitted during emergency:	
Describe the steps taken to mitigate the problem:	
Describe the corrective actions/response steps taken:	
Describe the measures taken to minimize emissions:	
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:	

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: Morton Powder Coatings  
Source Address: 1102 Leiter Drive, Warsaw, Indiana 46580  
Mailing Address: 1102 Leiter Drive, Warsaw, Indiana 46580  
FESOP No.: F085-12589-00085

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)**

#### **Source Background and Description**

Source Name:	Morton International, Inc.
Source Location:	1102 Leiter Drive, Warsaw, Indiana 46580
County:	Kosciusko
SIC Code:	2851
Operation Permit No.:	F085-12589-00085
Permit Reviewer:	ERG/KC

On June 12, 2001, the Office of Air Quality (OAQ) had a notice published in the Times Union in Warsaw, Indiana, stating that Morton International, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a powder coating manufacturing facility with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On March 6, 2001, Morton International, Inc. submitted comments on the proposed FESOP. The summary of the comments is as follows:

#### **Comment 1:**

Change Condition A.4 to indicate that the source is otherwise required to have a Part 70 Permit if the baghouses are not considered process equipment because the necessity for a Part 70 Permit or FESOP turns on the status of the baghouses.

#### **Response to Comment 1:**

The baghouses are not considered process equipment. This decision and the reasoning behind it are both documented in the TSD. The addition of a reference to the baghouses not being considered process equipment is not necessary therefore no change was made in response to this comment.

#### **Comment 2:**

Change Condition A.5 to include a shield for compliance with applicable requirements in effect at the time of issuance.

#### **Response to Comment 2:**

The permit shield is applicable to Part 70 Permits, and not to Federally Enforceable State Operating Permits (FESOP).

**Comment 3:**

Revise Condition B.4 accordingly:

- (a) All terms and conditions, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit that limit the source's potential to emit are enforceable by the U.S. EPA and citizens under the clean air act.

This revision will clarify what is intended in the condition.

**Response to Comment 3:**

No change was made in response to this comment because the change requested is inconsistent with 326 IAC 2-8-6(b). IDEM believes that the current language in the permit is sufficient.

**Comment 4:**

The source suggested that the language in Condition B.8(b) and (c) be replaced with the following:

- (b) The Permittee shall also provide additional information as requested by IDEM, OAQ, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(a).
- (c) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (d) Upon written request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to both the U.S. EPA, and IDEM, OAQ, along with a claim of confidentiality.
- (e) Such confidentiality claims shall meet the requirements of 40 CFR Part 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM).

The source pointed out that the suggested language matches the language in the FESOP for Deister Machine Company, Inc., (F003-6845-00235). The source also believes that the existing language implies that IDEM will not honor or consider a claim that information is confidential.

**Response to Comment 4:**

IDEM, OAQ agrees with Morton International, Inc. that the language in B.8(b) and (c) can be changed to language in F003-6845-00235.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

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- (b) **The Permittee shall also provide additional information as requested by IDEM, OAQ, to determine the compliance status of the source in accordance with 326 IAC 2-8-5(2).**
- (c) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (d) Upon **written** request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. ~~or For information claimed to be confidential, the Permittee may~~ **shall** furnish such records directly to **both** the U.S. EPA **and** IDEM, **OAQ**, along with a claim of confidentiality. ~~{326 IAC 2-8-4(5)(E)}~~
- (e) **Such confidentiality claims shall meet the requirements of 40 CFR part 2, Subpart B (when submitting to the U.S. EPA) and 326 IAC (when submitting to IDEM, OAQ).**

**Comment 5:**

Change the language in Condition B.11(b) to clarify that the form being referred to is only appropriate when certifications of compliance are required. Add "of compliance" to the end of the sentence.

**Response to Comment 5:**

No change has been made in response to this comment because IDEM, OAQ does not agree with the source that the form referred to in this Condition is only used for certifications of compliance.

**Comment 6:**

To simplify the reporting process, change the language in Condition B.12(c) to say "The attached Certification Form shall be submitted as the annual certification report."

**Response to Comment 6:**

No change was made in response to this comment because IDEM, OAQ believes that the language change could result in sources not submitting enough information. The language currently in the permit specifies all of the needed information.

**Comment 7:**

The source feels that the language in Condition B.12(c)(3) should be changed to say "Whether compliance was based on continuous or intermittent data;" as it does in the FESOP for Honeywell International, Inc., (F069-12492-00034) because reports should only be required to indicate the type of information used as a basis for compliance determination.

**Response to Comment 7:**

The language 40 CFR Part 70.6(c)(5)(B)(iii) was changed from "continuous or intermittent compliance" to "based on continuous or intermittent data" as part of the U.S. EPA's 1997 Compliance Assurance Monitoring Rulemaking (Federal Register Volume 62, page 54900-54947, Wednesday, October 22, 1997). The U.S. District Court of Appeals, Washington, DC ruled against EPA's language, saying that the Clean Air Act wording of continuous or intermittent compliance had to be used (NRDC vs. EPA, #97-1727). Therefore, no change was made to the permit as a result of this comment.

**Comment 8:**

Change Condition B.13 to specify that the Preventive Maintenance Plan is not federally enforceable. The PMP and its contents are state only requirements.

**Response to Comment 8:**

No change was made as a result of this comment. The condition is included in a Federally Enforceable State Operating Permit (FESOP) and pursuant to 40 CFR 52.23, it is considered federally enforceable.

**Comment 9:**

Specify that Condition B.13(d) is not federally enforceable. No such provision is required by the regulations. This provision is not normally included in IDEM FESOPs.

**Response to Comment 9:**

See the response to Comment 8.

**Comment 10:**

The source feels that a new provision B.15(b)(2) should be inserted and the current B.15(b)(2) should be renumbered as B.15(b)(3):

- (2) An emergency as defined in 326 IAC 2-7-1(12); or

This change was included in the FESOP for Asphalt Company, Inc., (F163-10847-00020) and the FESOP for A.P. Green Refractories (F089-7694-00105) and is appropriate to eliminate minor paperwork problems as deviations. Also add an additional exception from circumstances defined as "deviations." Add a new B.15(b)(4) as follows:

- (4) Failure to make or record information required by the compliance monitoring provision of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

These changes were included in the previously mentioned permits.

**Response to Comment 10:**

IDEM, OAQ agrees with this change and the following alteration was made to the permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit;
  - (2) **An emergency as defined in 326 IAC 2-7-1(12);**
  - ~~(2)~~(3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation; **or**
  - (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failures exceed 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

**Comment 11:**

The source requested that Condition B.18 be supplemented with four more specific sections to provide a more accurate statement of the provisions relating to revision of permits under various circumstances. The source gave the following wording for these four new sections:



**B.19 Administrative Permit Amendment [326 IAC 2-8-10]**

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- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).
- (b) An administrative permit amendment may be made by IDEM, OAQ, consistent with the procedures specified under 326 IAC 2-8-10(b).
- (c) The Permittee may implement the changes addressed in the requirements for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)].

**B.20 Minor Permit Modification [326 IAC 2-8-11(a)][326 IAC 2-8-11(b)(1) and (2)]**

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- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor permit modification procedures shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application unless the change is subject to the construction permit requirements of 326 IAC 2-1, 326 IAC 2-2, or 326 IAC 2-3. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAQ takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it [326 IAC 2-8-11(b)(6)].

**B.21 Significant Permit Modification**

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- (a) Significant modification procedures shall be used for applications requesting permit modification that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, and review by the U.S. EPA, as they apply to permit issuance and renewal.

**B.22 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]**

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Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable FESOP's, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable implementation plan (SIP) or in applicable requirements promulgated by the U.S. EPA.

**Response to Comment 11:**

No change has been made in response to this comment because the text in B.18 has been carefully prepared to convey what IDEM feels necessary. This text is standard language and IDEM considers it sufficient.

**Comment 12:**

Delete Condition C.2 (Opacity) because visible emission requirements are already stated in Section D. This provision is unnecessary and confusing.

**Response to Comment 12:**

No change has been made in response to this comment because the Condition states that opacity should meet the following unless otherwise noted in the permit. The visible emission notations conditions in Section D are something otherwise noted in the permit and the conditions give more details on how the visible emissions must be monitored. Condition C.2 sets the opacity standard and describes what emissions can be classified as normal.

**Comment 13:**

Specify that the provision in Condition C.8 (Asbestos Abatement Projects) requiring a ten day notice of a demolition whether or not asbestos is present is not federally enforceable. The source believes that the federal regulations in Subpart M require notice of demolition projects only when asbestos is present. IDEM regulations require notice whether or not asbestos is present. Therefore, notification in the absence of asbestos is not federally enforceable.

**Response to Comment 13:**

Demolition is defined as removing supporting beams, walls or structures of a facility. The federal regulations in Subpart M and 326 IAC 14-10-1(a)(1) both state that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present. The language in the permit is the same as the language in 40 CFR 61, Subpart M. Therefore, the condition is federally enforceable. No change was made as a result of this comment. The condition is included in a Federally Enforceable State Operating Permit (FESOP) and pursuant to 40 CFR 52.23, it is considered federally enforceable.

**Comment 14:**

Delete Condition C.9 (Performance Testing) because no equipment at this source requires such performance testing.

**Response to Comment 14:**

No change has been made in response to this comment because even though no facilities at the source currently require performance testing, IDEM, OAQ can request such performance tests at any time. Additionally, the statement could apply to future additions made to the source.

**Comment 15:**

Delete Condition C.10 (Compliance Requirements) because specific testing, monitoring, or reporting requirements are set forth in connection with specific equipment in Section D of the permit. It only adds confusion to have duplicative or conflicting requirements in separate sections of the permit.

**Response to Comment 15:**

No change has been made in response to this comment because IDEM, OAQ can request specific stack testing, monitoring, or reporting activities in addition to the requirements in Section D of the permit at any time in order to assure compliance.

**Comment 16:**

Delete Condition C.15 (Risk Management Plan) as the facility does not need to prepare a RMP.

**Response to Comment 16:**

This condition must remain in the permit because the plan must be submitted if the Permittee meets the threshold at some time in the future. The condition remains unchanged.

**Comment 17:**

Specify that Condition C.16 (Compliance Monitoring Plan) is not federally enforceable. This plan is required by state regulation.

**Response to Comment 17:**

Compliance monitoring are conditions on the operation of the source that are used to limit the potential to emit regulated air pollutants. Since this condition is designed to limit the potential to emit, it is federally enforceable.

**Comment 18:**

Add a new provision to Condition C.20 (General Record Keeping Requirements) stating "Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation on emissions or potential to emit, or a deviation as defined in B.15(b). To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported." This provision is necessary to establish a basis for making the demonstration allowed under B.15(b)(2).

**Response to Comment 18:**

The new provision to C.18 (General Record Keeping Requirements) is added to the permit as follows:

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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- (c) **Records of Preventive Maintenance may be used to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation on emissions or potential to emit, or a deviation as defined in B.15(b). The records may include, but are not limited to: word orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to Take Response Steps, of this permit, and whether a deviation from a permit condition was reported.**

**Comment 19:**

Change the reporting requirements in C.19 (General Reporting Requirements) from Quarterly to Semi-annually. Semi-annual deviation and monitoring reports are required in 326 IAC 3-8-4(3)(c)(i) and under the federal Title V program. IDEM has provided no justification for more stringent requirements than the six month reports required by the regulation.

**Response to Comment 19:**

IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAQ believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance.

**Comment 20:**

In Condition D.1.4 (Preventive Maintenance Plan), specify that the PMP is not federally enforceable.

**Response to Comment 20:**

No change was made as a result of this comment. The condition is included in a Federally Enforceable State Operating Permit (FESOP) and pursuant to 40 CFR 52.23, it is considered federally enforceable. Also, since it is required in 326 IAC 1-6.3, it is approved into the SIP and it is federally enforceable.

**Comment 21:**

Specify that the visible emission notations required in Condition D.1.6 apply in lieu of opacity monitoring in C.2. This visual check is sufficient to satisfy any opacity limitations because opacity is not an issue for normal emissions.

**Response to Comment 21:**

C.2 does not specify monitoring activities, but it sets the opacity standard. D.1.6 does not override C.2, it just specifies monitoring activities that require the Permittee to record whether visible emissions are normal or abnormal. C.2 describes what emissions can be classified as normal. No change was made in response to this comment.

**Comment 22:**

Specify that Condition D.1.9 (Broken or Failed Filter Detection) is not federally enforceable. This provision was not designed to limit the source's potential to emit. Therefore, it is not federally enforceable.

**Response to Comment 22:**

Normal operating conditions were used to determine the permit level and the limits in the permit. In order to maintain these normal operating conditions, equipment, especially control equipment, must operate properly. Proper operation of the control equipment is required to limit the source's potential to emit. No change was made as a result of this comment. The condition is included in a Federally Enforceable State Operating Permit (FESOP) and pursuant to 40 CFR 52.23, it is considered federally enforceable.

**Comment 23:**

Change Condition D.2.1(d) to state "only burn waste specified in the permit or application or approved by the commissioner." The permit should allow the burning of the product accumulated on the extruder blades and other parts in the extruder blade burnoff incinerator.

**Response to Comment 23:**

No change has been made in response to this comment because the language currently in the permit is taken exactly from the regulation 326 IAC 4-2-2.

Upon further review, IDEM, OAQ, made the following corrections to this permit.

1. B.10 Compliance with Permit Conditions. This section has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit ~~except those specifically designated as not federally enforceable~~, is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP)**

#### **Source Background and Description**

Source Name: Morton International, Inc.  
Source Location: 1102 Leiter Drive, Warsaw, Indiana 46580  
County: Kosciusko  
SIC Code: 2851  
Operation Permit No.: F085-12589-00085  
Permit Reviewer: ERG/KC

The Office of Air Quality (OAQ) has reviewed a FESOP application from Morton International, Inc. relating to the operation of a powder coating manufacturing facility.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) quality control and sample testing area, identified as QC dust collection with a maximum capacity of 4.2 lb/hr and exhausting to stacks QCN and QCS.

#### **Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units:

- (a) One (1) air classifying mill, identified as ACM-1, installed in 1978 and modified in 1999, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-1.
- (b) One (1) air classifying mill, identified as ACM-2, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-2.
- (c) One (1) air classifying mill, identified as ACM-3, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-3.
- (d) One (1) air classifying mill, identified as ACM-4, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-4.

- (e) One (1) air classifying mill, identified as ACM-5, installed in 1978 and modified in 1998, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-5.
- (f) One (1) air classifying mill, identified as ACM-6, installed in 1978 and modified in 1997, with a maximum capacity that was increased in 2001 from 2,000 lb/hr to 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-6.
- (g) One (1) air classifying mill, identified as ACM-7, installed in 1993, with a maximum capacity of 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-7.
- (h) One (1) air classifying mill, identified as ACM-8, installed in 1993, with a maximum capacity of 2,500 lb/hr, equipped with a product collection cyclone and a dust collector, and exhausting to stack ACM-8.
- (i) Multiple dust collection points in the Weigh-up and Blending Area, identified as weigh-up area dust collection system, installed in 1994, with a maximum throughput of 6,040 lb/hr, including the pneumatic empty bag collection and compactor system and exhausting to stacks WU-1 and WU-2.
- (j) Multiple dust collection points in the Extrusion area, identified as extrusion area dust collection system with a maximum throughput of 6,040 lb/hr and exhausting to stack EX.

#### **New Emission Units and Pollution Control Equipment Receiving Advanced New Source Review Approval**

There are no new emission units and pollution control equipment receiving advanced new source review approval during this review process.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:
  - (1) Space heaters;
  - (2) Water heaters and;
  - (3) A 300,000 Btu/hr extruder blade burn-off incinerator.
- (b) Cleaners and solvents having a vapor pressure less than 15 mm Hg, or having a vapor pressure less than 5 mm Hg, the use of which does not exceed 145 gallons per year.
- (c) Closed loop cooling systems.
- (d) Operations using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) On-site fire and emergency response training approved by the department.

- (g) Grinding and machining operations controlled with fabric filters with a design grain loading of less than or equal to 0.03 gr/dscf and a gas flow rate less than or equal to 4000 acfm, including deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
- (h) Other categories with emissions below insignificant thresholds:
  - (1) Hoffman Dust Collection System - East;
  - (2) Hoffman Dust Collection System - West; and
  - (3) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.

### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP-43-01-8-0100, issued November 19, 1975, expired January 1, 1978.
- (b) OP-43-01-8-0101, issued November 19, 1975, expired January 1, 1978.
- (c) OP-43-01-82-0154, issued on April 12, 1978, expired January 1, 1982.
- (d) Operation permit status letter February 17, 1978.
- (e) Registration June 1, 1982.
- (f) Exempt operation status letter, June 1, 1982.
- (g) Registration issued on June 30, 1986.
- (h) Exempt construction and operation letter June 16, 1989.

All conditions from previous approvals were incorporated into this FESOP.

### **Air Pollution Control Justification as an Integral Part of the Process**

IDEM, OAQ has made the following determination for the cyclones which are installed in series with the baghouses/dust collectors:

IDEM, OAQ has evaluated the justifications and agreed that the product collection cyclones on each of the eight air classifying mills be considered as an integral part of the powder coating manufacturing process. The following justification was considered in the final determination:

- (a) The cyclones are used to capture ninety-five percent (95%) of powder coating products. Without these cyclones, the source's product will all be wasted.

Therefore, the permitting level will be determined using the potential to emit after the product collection cyclones. Operating conditions in the proposed permit will specify that these product collection cyclones shall operate at all times when the powder coating manufacturing process is in operation.

The company has also submitted the following justification that the dust collectors on each of the eight air classifying mills be considered as an integral part of the powder coating manufacturing process:



- (a) The dust collectors are used to collect the fines not collected by the product collection cyclones. These fines are sometimes used as an input to the production of a specialized product and sometimes the fines collected are discarded.
- (b) The dust collectors were initially installed to serve the primary purpose of product collection but were replaced by the product collection cyclones to facilitate better product homogeneity.
- (c) The dust collectors collect approximately 5% of the overall powder material generated from the eight air classifying mills.

IDEM, OAQ has evaluated the justifications and determined that the dust collectors on each of the eight air classifying mills will not be considered as an integral part of the powder coating manufacturing process because there is no over-whelming economic incentive to use them. Therefore, the permitting level will be determined using the potential to emit before the dust collectors.

### **Enforcement Issue**

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### **Recommendation**

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP application for the purposes of this review was received on August 16, 2000. Additional information was received on October 18, 2000.

### **Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document, pages 1 through 4.

### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	4,440
PM-10	2,690
SO <sub>2</sub>	<1
VOC	<1
CO	<1
NO <sub>x</sub>	<1

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Antimony compounds	3.0
Nickel compounds	2.6
Chromium compounds	0.70
Manganese compounds	0.0017
Cobalt compounds	0.38
Copper compounds	0.071
TOTAL	6.8

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP). This source has chosen to limit PM10 emissions to below one hundred (100) tons per twelve (12) consecutive month period. This limitation will render the requirements of 326 IAC 2-7 not applicable.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.0
PM-10	1.0
SO <sub>2</sub>	not reported
VOC	not reported
CO	not reported
NO <sub>x</sub>	not reported
HAP (specify)	not reported

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit. The potential to emit of PM is limited by control equipment required to meet the Process Operations PM rule (326 IAC 6-3-2). This control equipment also controls the emissions of PM<sub>10</sub> and HAPs.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
ACM-1	2.74	1.64	NA	NA	NA	NA	1.84E <sup>-4</sup>
ACM-2	2.74	1.64	NA	NA	NA	NA	1.84E <sup>-4</sup>
ACM-3	2.74	1.64	NA	NA	NA	NA	1.84E <sup>-4</sup>
ACM-4	2.74	1.64	NA	NA	NA	NA	1.84E <sup>-4</sup>
ACM-5	2.74	1.64	NA	NA	NA	NA	1.84E <sup>-4</sup>
ACM-6	2.74	1.64	NA	NA	NA	NA	1.84E <sup>-4</sup>
ACM-7	2.74	1.64	NA	NA	NA	NA	1.83E <sup>-4</sup>
ACM-8	2.74	1.64	NA	NA	NA	NA	1.83E <sup>-4</sup>
Weigh-up area dust collection	0.34	0.34	NA	NA	NA	NA	2.83E <sup>-3</sup>
Extruder area dust collection	0.21	0.21	NA	NA	NA	NA	1.77E <sup>-3</sup>
QC area dust collection	0.09	0.09	NA	NA	NA	NA	7.36E <sup>-4</sup>
Total Emissions	22.56	13.76	NA	NA	NA	NA	6.8E <sup>-3</sup>

### County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone.
- (b) Kosciusko County has been classified a attainment or unclassifiable for PM10, SO<sub>2</sub>, NO<sub>2</sub>, CO, and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (PSD Rules)

The source will limit PM10 emissions to less than 100 tons per year which will render 326 IAC 2-7 (Part 70 Permit Program) not applicable. For this source, PM10 emissions equal PM emissions, therefore, the source will limit PM emissions to less than 100 tons per year which will also render 326 IAC 2-2 (PSD) not applicable. The source will be in compliance with the limitation by controlling PM and PM10 emissions with the product collection cyclones and the dust collectors, in series. The PM and PM10 emissions will be limited as follows.

Emission Unit	Allowable PM Emissions (tons/year)
ACM-1	1.64
ACM-2	1.64
ACM-3	1.64
ACM-4	1.64
ACM-5	1.64
ACM-6	1.64
ACM-7	1.64
ACM-8	1.64
Weigh-up dust collection	0.34
Extrusion area dust collection	0.21
QC area dust collection	0.09

#### 326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because this permit limits the emission of PM and PM10 to less than 100 tons per year.

#### 326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires that the source not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-4.1 New Source Toxics Control

These units will emit <10/25 HAPs, therefore the rule does not apply.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from each of the listed units shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

Allowable particulate matter emissions are as follows:

Unit	Process Weight Rate (ton/yr)	PM Emission (lb/hr)
ACM-1	1.25	4.76
ACM-2	1.25	4.76
ACM -3	1.25	4.76
ACM-4	1.25	4.76
ACM-5	1.25	4.76
ACM-6	1.25	4.76
ACM-7	1.25	4.76
ACM-8	1.25	4.76
Weigh-up area dust collection	3.02	8.6
Extrusion area dust collection	3.02	8.6
QC area dust collection	0.0021	0.66

The product collection cyclones and the baghouses shall be in operation at all times that the listed equipment are in operation in order to comply with this limit.

326 IAC 4-2 (Burning Regulations for Incinerators)

Pursuant to 326 IAC 4-2-2, the 300,000 Btu/hr burn-off incinerator shall:

- (a) Consist of primary and secondary chambers or the equivalent.
- (b) Be equipped with a primary burner unless burning wood products.
- (c) Comply with 326 IAC 5-1 and 326 IAC 2.
- (d) Be maintained properly as specified by the manufacturer's recommendations and only burn waste approved by the commissioner.
- (e) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner.
- (f) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators.
- (g) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented.
- (h) Allow only particulate matter emissions less than:

- (1) Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three tenths (0.3) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or
  - (2) All other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1,000) of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air.
- (i) Not create a nuisance or a fire hazard.

If any of the above conditions are not met, the burning shall be terminated immediately.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The ACM-1 through ACM-8, the weigh-up area, extrusion area, and QC area have applicable compliance monitoring conditions as specified below:
  - (a) Visible emissions notations of the stack exhaust shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
  - (b) The Permittee shall record the total static pressure drop across the dust collectors controlling the processes, at least once per shift when the processes are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across each dust collector shall be maintained within the range of 2.0 to 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan

for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the dust collectors for the processes must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this powder coating manufacturing facility shall be subject to the conditions of the attached proposed FESOP No.: F085-12589-00085.

**PM and PM10 Emissions**

Unit	Description	Old Average Rate (lb/hr)	Cyclone Separation Efficiency (%)	Fines to Dust Collector (lb/hr)	New Average Rate after Modification (lb/hr)	Fines to Dust Collector @ 2500 lb/hr (lb/hr)	Potential PM Emissions (ton/yr)	Portion of PM that is PM10 (%)	Potential PM10 Emissions (ton/yr)	Control Efficiency (%)	Controlled PM Emissions (ton/yr)	Controlled PM10 Emissions (ton/yr)
ACM-1	air classifying mill no. 1	2000	95%	100.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-2	air classifying mill no. 2	2000	95%	100.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-3	air classifying mill no. 3	2000	95%	100.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-4	air classifying mill no. 4	2000	95%	100.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-5	air classifying mill no. 5	2000	95%	100.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-6	air classifying mill no. 6	2000	95%	100.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-7	air classifying mill no. 7	2500	95%	125.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
ACM-8	air classifying mill no. 8	2500	95%	125.00	2500	125.00	<b>547.50</b>	60%	<b>328.50</b>	99.50%	<b>2.74</b>	<b>1.64</b>
weigh-up area dust collection	dust collection points in the weigh-up and blending area			7.69		7.69	<b>33.68</b>	100%	<b>33.68</b>	99.00%	<b>0.34</b>	<b>0.34</b>
extruder area dust collection	dust collection points in the extrusion area			4.90		4.90	<b>21.46</b>	100%	<b>21.46</b>	99.00%	<b>0.21</b>	<b>0.21</b>
QC dust collection	points in the QC and sample testing area			2.10		2.10	<b>9.20</b>	100%	<b>9.20</b>	99.00%	<b>0.09</b>	<b>0.09</b>

Total  
Potential  
PM:

**4444.34**

Total  
Potential  
PM10:

**2692.34**



**Appendix A: Emissions Calculations**  
**Company Name:** Morton Powder Coatings  
**Address City IN Zip:** 1102 Leiter Drive, Warsaw. IN 45680  
**Permit Number:** F085-12589-00085  
**Plt ID:** 085-00085  
**Reviewer:** ERG/CB  
**Date:** 09/12/00

HAPs Emissions

Unit	Description	Pollutant	Max rate of fines collected (ton/hr) @ 2000 lb/hr	efficiency (%)	*Max rate of fines (ton/hr) @ 2000 lb/hr	**Emission Factor (lb/ton)	Emission Rate (lb/hr) @ 2000 lb/hr	Max uncontrolled emissions (tons/yr) @ 2000 lb/hr	Max controlled emissions (ton/yr) @ 2000 lb/hr	Max uncontrolled emissions (ton/yr) @ 2500 lb/hr	Max controlled emissions @ 2500 lb/hr
ACM-1	air classifying mill no. 1	Antimony	0.0105	99.976	0.0105	6.031	0.063	0.277	6.658E-05	0.3468	8.32E-05
ACM-1	air classifying mill no. 1	Nickel	0.0105	99.976	0.0105	5.224	0.055	0.240	5.767E-05	0.3004	7.21E-05
ACM-1	air classifying mill no. 1	Chromium	0.0105	99.976	0.0105	1.407	0.015	0.065	1.553E-05	0.0809	1.94E-05
ACM-1	air classifying mill no. 1	Manganese	0.0105	99.976	0.0105	0.0034	0.000036	0.0002	3.754E-08	0.0002	4.69E-08
ACM-1	air classifying mill no. 1	Cobalt	0.0105	99.976	0.0105	0.505	0.005	0.023	5.575E-06	0.0290	6.97E-06
ACM-1	air classifying mill no. 1	Copper	0.0105	99.976	0.0105	0.143	0.0015	0.007	1.579E-06	0.0082	1.97E-06
ACM-2	air classifying mill no. 2	Antimony	0.0105	99.976	0.0105	6.031	0.063	0.277	6.658E-05	0.3468	8.32E-05
ACM-2	air classifying mill no. 2	Nickel	0.0105	99.976	0.0105	5.224	0.055	0.240	5.767E-05	0.3004	7.21E-05
ACM-2	air classifying mill no. 2	Chromium	0.0105	99.976	0.0105	1.407	0.015	0.065	1.553E-05	0.0809	1.94E-05
ACM-2	air classifying mill no. 2	Manganese	0.0105	99.976	0.0105	0.0034	0.000036	0.0002	3.754E-08	0.0002	4.69E-08
ACM-2	air classifying mill no. 2	Cobalt	0.0105	99.976	0.0105	0.505	0.005	0.023	5.575E-06	0.0290	6.97E-06
ACM-2	air classifying mill no. 2	Copper	0.0105	99.976	0.0105	0.143	0.0015	0.007	1.579E-06	0.0082	1.97E-06
ACM-3	air classifying mill no. 3	Antimony	0.0105	99.976	0.0105	6.031	0.063	0.277	6.658E-05	0.3468	8.32E-05
ACM-3	air classifying mill no. 3	Nickel	0.0105	99.976	0.0105	5.224	0.055	0.240	5.767E-05	0.3004	7.21E-05
ACM-3	air classifying mill no. 3	Chromium	0.0105	99.976	0.0105	1.407	0.015	0.065	1.553E-05	0.0809	1.94E-05
ACM-3	air classifying mill no. 3	Manganese	0.0105	99.976	0.0105	0.0034	0.000036	0.0002	3.754E-08	0.0002	4.69E-08
ACM-3	air classifying mill no. 3	Cobalt	0.0105	99.976	0.0105	0.505	0.005	0.023	5.575E-06	0.0290	6.97E-06
ACM-3	air classifying mill no. 3	Copper	0.0105	99.976	0.0105	0.143	0.0015	0.007	1.579E-06	0.0082	1.97E-06
ACM-4	air classifying mill no. 4	Antimony	0.0105	99.976	0.0105	6.031	0.063	0.277	6.658E-05	0.3468	8.32E-05
ACM-4	air classifying mill no. 4	Nickel	0.0105	99.976	0.0105	5.224	0.055	0.240	5.767E-05	0.3004	7.21E-05
ACM-4	air classifying mill no. 4	Chromium	0.0105	99.976	0.0105	1.407	0.015	0.065	1.553E-05	0.0809	1.94E-05
ACM-4	air classifying mill no. 4	Manganese	0.0105	99.976	0.0105	0.0034	0.000036	0.0002	3.754E-08	0.0002	4.69E-08
ACM-4	air classifying mill no. 4	Cobalt	0.0105	99.976	0.0105	0.505	0.005	0.023	5.575E-06	0.0290	6.97E-06
ACM-4	air classifying mill no. 4	Copper	0.0105	99.976	0.0105	0.143	0.0015	0.007	1.579E-06	0.0082	1.97E-06
ACM-5	air classifying mill no. 5	Antimony	0.0105	99.976	0.0105	6.031	0.063	0.277	6.658E-05	0.3468	8.32E-05
ACM-5	air classifying mill no. 5	Nickel	0.0105	99.976	0.0105	5.224	0.055	0.240	5.767E-05	0.3004	7.21E-05
ACM-5	air classifying mill no. 5	Chromium	0.0105	99.976	0.0105	1.407	0.015	0.065	1.553E-05	0.0809	1.94E-05
ACM-5	air classifying mill no. 5	Manganese	0.0105	99.976	0.0105	0.0034	0.000036	0.0002	3.754E-08	0.0002	4.69E-08
ACM-5	air classifying mill no. 5	Cobalt	0.0105	99.976	0.0105	0.505	0.005	0.023	5.575E-06	0.0290	6.97E-06

ACM-5	air classifying mill no. 5	Copper	0.0105	99.976	0.0105025	0.143	0.0015	0.007	1.579E-06	0.0082	1.97E-06
ACM-6	air classifying mill no. 6	Antimony	0.0105	99.976	0.0105025	6.031	0.063	0.277	6.658E-05	0.3468	8.32E-05

ACM-6	air classifying mill no. 6	Nickel	0.0105	99.976	0.0105025	5.224	0.055	0.240	5.767E-05	0.3004	7.21E-05
ACM-6	air classifying mill no. 6	Chromium	0.0105	99.976	0.0105025	1.407	0.015	0.065	1.553E-05	0.0809	1.94E-05
ACM-6	air classifying mill no. 6	Manganese	0.0105	99.976	0.0105025	0.0034	0.000036	0.0002	3.754E-08	0.0002	4.69E-08
ACM-6	air classifying mill no. 6	Cobalt	0.0105	99.976	0.0105025	0.505	0.005	0.023	5.575E-06	0.0290	6.97E-06
ACM-6	air classifying mill no. 6	Copper	0.0105	99.976	0.0105025	0.143	0.0015	0.007	1.579E-06	0.0082	1.97E-06
ACM-7	air classifying mill no. 7	Antimony	0.0131	99.976	0.0131	6.031	0.0790	0.346	8.307E-05	0.3461	8.31E-05
ACM-7	air classifying mill no. 7	Nickel	0.0131	99.976	0.0131	5.224	0.0685	0.300	7.196E-05	0.2998	7.20E-05
ACM-7	air classifying mill no. 7	Chromium	0.0131	99.976	0.0131031	1.407	0.0184	0.081	1.938E-05	0.0808	1.94E-05
ACM-7	air classifying mill no. 7	Manganese	0.0131	99.976	0.0131031	0.0034	0.000045	0.0002	4.683E-08	0.0002	4.68E-08
ACM-7	air classifying mill no. 7	Cobalt	0.0131	99.976	0.0131031	0.505	0.0066	0.029	6.956E-06	0.0290	6.96E-06
ACM-7	air classifying mill no. 7	Copper	0.0131	99.976	0.0131031	0.143	0.0019	0.008	1.97E-06	0.0082	1.97E-06
ACM-8	air classifying mill no. 8	Antimony	0.0131	99.976	0.0131031	6.031	0.0790	0.346	8.307E-05	0.3461	8.31E-05
ACM-8	air classifying mill no. 8	Nickel	0.0131	99.976	0.0131031	5.224	0.0685	0.300	7.196E-05	0.2998	7.20E-05
ACM-8	air classifying mill no. 8	Chromium	0.0131	99.976	0.0131031	1.407	0.0184	0.081	1.938E-05	0.0808	1.94E-05
ACM-8	air classifying mill no. 8	Manganese	0.0131	99.976	0.0131031	0.0034	0.000045	0.0002	4.683E-08	0.0002	4.68E-08
ACM-8	air classifying mill no. 8	Cobalt	0.0131	99.976	0.0131031	0.505	0.0066	0.029	6.956E-06	0.0290	6.96E-06
ACM-8	air classifying mill no. 8	Copper	0.0131	99.976	0.0131031	0.143	0.0019	0.008	1.97E-06	0.0082	1.97E-06
weigh-up area dust collection	dust collection points in the weigh-up and blending area	Antimony	0.00385	99	0.00389	6.040	0.0235	0.103	1.029E-03	0.1286	1.29E-03
weigh-up area dust collection	dust collection points in the weigh-up and blending area	Nickel	0.00385	99	0.00389	5.220	0.0203	0.089	8.891E-04	0.1111	1.11E-03
weigh-up area dust collection	dust collection points in the weigh-up and blending area	Chromium	0.00385	99	0.00389	1.400	0.0054	0.024	2.385E-04	0.0298	2.98E-04
weigh-up area dust collection	dust collection points in the weigh-up and blending area	Manganese	0.00385	99	0.00389	0.0034	0.00001	0.0001	5.791E-07	0.0001	7.24E-07
weigh-up area dust collection	dust collection points in the weigh-up and blending area	Cobalt	0.00385	99	0.00389	0.500	0.0019	0.009	8.517E-05	0.0106	1.06E-04
weigh-up area dust collection	dust collection points in the weigh-up and blending area	Copper	0.00385	99	0.00389	0.140	0.0005	0.002	2.385E-05	0.0030	2.98E-05
extruder area dust collection	dust collection points in the extrusion area	Antimony	0.0024	99	0.00242	6.040	0.0146	0.064	6.413E-04	0.0802	8.02E-04

extruder area dust collection	dust collection points in the extrusion area	Nickel	0.0024	99	0.00242	5.220	0.0127	0.055	5.543E-04	0.0693	6.93E-04
extruder area dust collection	dust collection points in the extrusion area	Chromium	0.0024	99	0.00242	1.400	0.0034	0.015	1.487E-04	0.0186	1.86E-04

extruder area dust collection	dust collection points in the extrusion area	Manganese	0.0024	99	0.00242	0.0034	0.0000	0.00004	3.610E-07	0.0000	4.51E-07
extruder area dust collection	dust collection points in the extrusion area	Cobalt	0.0024	99	0.00242	0.500	0.0012	0.005	5.309E-05	0.0066	6.64E-05
extruder area dust collection	dust collection points in the extrusion area	Copper	0.0024	99	0.00242	0.140	0.0003	0.001	1.487E-05	0.0019	1.86E-05
QC dust collection	dust collection points in the QC and sample testing area	Antimony	0.001	99	0.0010101	6.040	0.006101	0.027	0.00026722	0.0334	3.34E-04
QC dust collection	dust collection points in the QC and sample testing area	Nickel	0.001	99	0.0010101	5.220	0.005273	0.023	0.00023095	0.0289	2.89E-04
QC dust collection	dust collection points in the QC and sample testing area	Chromium	0.001	99	0.0010101	1.400	0.001414	0.006	6.194E-05	0.0077	7.74E-05
QC dust collection	dust collection points in the QC and sample testing area	Manganese	0.001	99	0.0010101	0.0034	3.43E-06	0.00002	1.504E-07	0.0000	1.88E-07
QC dust collection	dust collection points in the QC and sample testing area	Cobalt	0.001	99	0.0010101	0.500	0.000505	0.002	2.212E-05	0.1286	2.77E-05
QC dust collection	dust collection points in the QC and sample testing area	Copper	0.001	99	0.00101	0.140	0.0001	0.0006	6.194E-06	0.0008	7.74E-06
									Total HAPs	6.7806	0.0068

\*Max rate of fines is calculated as max rate of fines collected divided by the efficiency of the dust collector

\*\*Emission factors are calculated by Morton Powder Coatings to be the ratio of the metal compound utilized in the mixture to the total raw materials utilized